

EPA REGISTRATION NUMBER 87373-2 – PART 2

PROCESSING REQUEST

Reg # 87373-2 Decision # 537618

Description: New Alt. 1 CSF

Electronic Label & Letter (see PPLS): OR Non Electronic Label & Letter (Scanning required):

☐ Dated: ☐ Dated:

Only one label type should be selected

Other Materials Sent (see jacket):

☒ New CSF(s) Dated: Alt. 1 1-12-2018

☐ Other:

File this coversheet and attached materials in the jacket. It must be well organized and clipped together, NOT STAPLED. Then give the jacket with the coversheet and materials to staff in the Information Services Center (ISC) (Room S-4900). If a jacket is full or only available as an image, please file materials in a new jacket and bring it down to the (ISC). For further information please call 703-605-0716.

Reviewer: Matt Aubuchon

Division: RD IVB-1

Phone: 347-0477 Date: 8-20-2018



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

August 20, 2018

Ann Tillman
Agent
Argite, LLC
c/o Pyxis Regulatory Consulting Inc.
4110 136th St. C. NW
Gig Harbor, WA 98332

Subject: PRIA CSF Amendment – Proposed Alternate CSF 1 with new manufacturing site
in India
Product Name: Deltamethrin Technical
EPA Registration Number: 87373-2
Application Date: 18-Jan-2018
Decision Number: 537618

Dear Ms. Tillman:

The Confidential Statement of Formula (CSF) referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, is acceptable. This approval does not affect any conditions that were previously imposed on this registration. You continue to be subject to existing conditions on your registration and any deadlines connected with them.

Please note that the record for this product currently contains the following CSFs:

- Basic CSF dated 07/31/2014
- Alternate CSF 1 dated 01/12/2018

Any CSFs other than those listed above are superseded/no longer valid. If you have any questions, please contact Matthew Aubuchon by phone at 703 347-0477, or via email at Aubuchon.Matthew@epa.gov.

Sincerely,

A handwritten signature in black ink, which appears to read "Elizabeth Fertich", is positioned above the typed name.

Elizabeth Fertich
Product Manager 04
Invertebrate & Vertebrate Branch 1
Registration Division (7505P)
Office of Pesticide Programs



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

FEF

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION
OFFICE OF PESTICIDE PROGRAMS REGISTRATION DIVISION (7505P)

DP BARCODE: D445483; FILE SYMBOL No.: 87373-2; PRODUCT: Deltamethrin Technical
PCC: 097805; FOOD USE: No

DATE: August 15, 2018

SUBJECT: Product Chemistry Review of Deltamethrin Technical TGAI / MUP

FROM: Akiva Abramovitch, Ph.D.
CITAB/ RD (7505P)

THROUGH: Shyam Mathur, Ph.D.
Product Chemistry Team Leader
CITAB/ RD (7505P)

S. Abramovitch
8-15-18

TO: Matt Aubuchon / Elizabeth Fertich, PM 03
IVB1 / Registration Division (7505P)

Company Name: Argite LLC.

Formulation Type: Technical Insecticide (Solid-Powder)

INTRODUCTION:

The registrant Argite has submitted an application for a new manufacturing site by [REDACTED]. The deltamethrin technical TGAI / MUP for the basic CSF is produced by [REDACTED]. [REDACTED] is supported by 830 series group A data with MRID Nos 503957-01 and -02. The label claim is for 98.50% Deltamethrin TGAI/MUP and the basic CSF is dated July 31, 2014.

SUMMARY OF FINDINGS:

CITAB has reviewed the product chemistry data submitted for Deltamethrin TGAI/MUP (produced by [REDACTED]) and has concluded that:

1. All the product chemistry data submitted corresponding to guidelines 830 Series group A data are acceptable.
2. The five batches ranged from 98.71% to 98.78% for an average of 98.74% and within the certified limits of the label claim of 98.5%
3. There are no impurities of toxicological concerns listed on the alternate CSF.

Product ingredient source information may be entitled to confidential treatment

DP BARCODE: D445483; FILE SYMBOL No.: 87373-2; PRODUCT: Deltamethrin Technical
PCC: 097805; FOOD USE: No

Table 1. Manufacturing and Impurity Data for deltamethrin TGAI / MUP				
GLN	Requirement	MRID	Status	Details and/or Deficiency
830.1550	Product Identity and composition	503957-01	A	The NC of AI (98.78%) is supported by 5 batch analysis & within the certified limits of the label claim nominal concentration. The registrant discussed the formation of f organic impurities. Only impurities were found at the concentrations of greater than 0.1%.
8301600	Description of materials used to produce the product	503957-01	A	The description & composition for all the starting materials used to produce deltamethrin technical have been provided by the registrant
830.1620	Description of production process	503957-01	A	The synthesis of deltamethrin technical is a batch process carried out in two reaction stages followed by a third stage, which includes crystallization, filtration, and drying of the finished product. The production process has been described in full details.
830.1670	Discussion of formation of impurities	503957-01	A	During the production of deltamethrin tgai/mup, the registrant reported the potential formation of organic impurities, out of which only impurities were found to be present at the concentrations of $\geq 0.1\%$, rest of the impurities were found to be present at the concentration of $< 0.1\%$ in addition to the . The registrant has provided the complete mechanisms of formation, quantification and identification of all the impurities present in the product
830.1700	Preliminary analysis	503957-02	A	Five representative batches deltamethrin technical were analyzed for percent active ingredient and the impurities. The active ingredient and the organic impurities were identified and quantified by using HPLC-UV with internal standard quantification methods. The analytical methods used for the assay for the active ingredient and impurities have been described in details.
830.1750	Certified limits	503957-02	A	The certified limits for the organic impurities were based on the five batch analysis.
830.1800	Enforcement analytical method	503957-02	A	The HPLC-UV (254 nm) with internal standard method was used for the determination of the AI content in the TGAI/MUP. The method was validated for precision, linearity and accuracy.
A = Acceptable; N = unacceptable (see Deficiency); N/A = Not Applicable; G = Data gap; I = In progress or need upgrade; U = Up-grade (additional information required)				

CONCLUSIONS

- 1 The proposed alternate CSE dated January 12, 2018 for the new manufacturing site by is acceptable and is supported by five batch analytical data from the manufacturing facility.

DP BARCODE: D445483; FILE SYMBOL No.: 87373-2; PRODUCT: Deltamethrin Technical
PCC: 097805; FOOD USE: No

30.1550. Product identity: (MRID No. 503957-01)

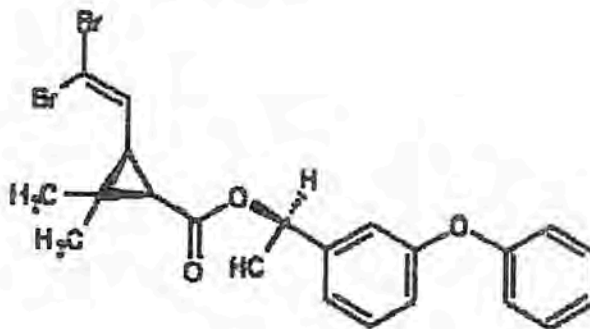
The Systematic Name, CAS Number and structure of Deltamethrin are depicted below:

Systematic Name (IUPAC):

(S)- α -Cyano-3-Phenoxybenzyl (1R, 3R)-3-(2, 2-dibromovinyl)-2, 2-dimethylcyclopropane carboxylate
52918-63-5

CAS Number:

Structure:



Manufacturing process information may be entitled to confidential treatment

DP BARCODE: D445483; FILE SYMBOL No.: 87373-2; PRODUCT: Deltamethrin Technical
PCC: 097805; FOOD USE: No

CONFIDENTIAL APPENDIX:



PRIA 3 – 21 Day Content Screen Review Worksheet

(EPA/OPP Use Only)

21 Day Screen Start Date: 1-19-18 September 2012

Experts In-Processing Signature: B.B. Date 1-25-18 Fee Paid: Yes ☒

Division management contacted on issues No ☐ Yes ☐ Date _____

EPA Reg. Number: <u>87373-2</u>		EPA Receipt Date: <u>1-19-18</u>				
Items for Review				Yes	No	N/A*
1	Application Form (EPA Form 8570-1) signed & complete including package type			X		
2	Confidential Statement of Formula all boxes completed, form signed, and dated (EPA Form 8570-4)			X		
	a) All <u>inerts</u> , including fragrances, approved for the proposed uses (see Footnote A) <u>No inerts to Review</u>	yes	no			
3	Certification with Respect to Citation of Data (EPA Form 8570-34) completed and signed (N/A if 100% repack)			X		
	Certificate and data matrix consistent			X		
	If applicant is relying on data that are compensable, is the offer to pay statement included. (see Footnote B)	yes	no			
	If applicable, is there a letter of Authorization for exclusive use only.					
4	Formulator's Exemption Statement (EPA Form 8570-27) completed and signed (N/A if source is unregistered or applicant owns the technical)					X
	Data Matrix (EPA Form 8570-35) both internal and external copies (PR 98-5) completed and signed (N/A if 100% repack)			X		
5	a) Selective Method (Fee category experts use)	yes	no			
	b) Cite-All (Fee category experts use)	X				
	c) Applicant owns all data (Fee category experts use)					
6	5 Copies of <u>Label</u> (Electronic labels on CD are encouraged and guidance is available)					X
7	Is the data package consistent with PR Notice 86-5			X		
8	Notice of Filing included with petitions					X

9	If applicable for conventional applications, <u>reduced risk rationale</u>			
	<u>Required Data</u> and/or data waivers. See Footnote C.			
10	a) List study (or studies) not included with application			

Comments:

Documentation: Pass
 - Required forms are complete

Inerts: Pass
 - No Inerts to Review

PRN 11-3: Pass
 - MRID: 503957

Overall status: Pass
 SM 1/26/18

* N/A – Not Applicable

Footnotes

A. During the 21 day initial content review, all CSFs will be reviewed to determine whether all inerts listed, including fragrances, are approved for the proposed uses or have an application pending with the Agency. If an unapproved inert with no application pending with the Agency is identified, the applicant must either 1) resolve the inert issue by, for example, removing the inert, substituting it with an approved inert, submitting documentation that EPA approved the inert for the proposed pesticidal uses, correcting mistakes on the CSF, etc. or 2) provide the data to support OPP approval of the inert or 3) withdraw the application. Removing or substituting an inert ingredient will require a new CSF and may require submission of data. All information, forms, data and documentation resolving the inert issue must have been received by the Agency or the application withdrawn within the 21 day period, otherwise, the Agency will reject the application as described below.

To successfully complete this aspect of the 21 day initial content screen, applicants are **strongly encouraged** to verify that all inert ingredients have been approved for the application's uses or have an application pending with the Agency **even if a product is currently registered** by consulting the [inert Web site](#) and if the inert is not approved nor has an application pending with the Agency, to **obtain the necessary inert approval prior to submitting an application to register a pesticide product containing that inert ingredient**. Some inert ingredients are no longer approved for food uses or certain types of uses. The name and/or CAS number on a CSF must match the name and CAS number on this web site. Simple typographical errors in the name or CAS number have resulted in processing delays.

If an inert is not listed on the inert ingredient web site and the applicant believes that the inert has been approved, the applicant should contact the Inert Ingredient Assessment Branch (IIAB) at inertsbranch@epa.gov and resolve the issue. Copies of the correspondence with IIAB resolving the issue should accompany the application. All new inerts except PIP inerts are reviewed by IIAB. The IIAB should also be contacted for any questions on what supporting data needs to be submitted for and the Agency's inert review process. Questions on PIP inerts should be directed to the [Chief of Microbial Pesticides Branch](#).

When a brand, trade, or proprietary name of an inert ingredient is listed on a CSF, additional information such as an alternate name of the inert, CAS number or other information must also be included to enable the Agency to determine if it has been approved. Each component of an inert mixture (including a fragrance) must be identified. In some cases, the supplier of the mixture or fragrance may need to provide this information to the Agency. Prior to the Agency's receipt of an application, applicants must arrange with a proprietary mixture or fragrance supplier to provide the component information to the Agency or promptly upon EPA's request. If the inert ingredients in a proprietary blend (including fragrances) cannot or are not identified or provided within the 21-day content review period, the Agency will reject the application.

During the 21 day content review, applicants should submit information to the individual identified by the Agency when the applicant is informed of an unapproved inert.

Unapproved Inerts Identified on CSFs

All applications except conventional new products and PIPs

Once an unapproved inert is identified on a CSF, the Agency will contact the applicant with the following options:

1. Correct the application by, for instance, correcting the inert's identity or CAS number, providing documentation that the inert has been approved, or removing the unapproved inert from the CSF or replacing it with one that is approved for the application's uses; or
2. Provide the required information necessary to identify an inert approval application that is pending with the Agency; or
3. Submit the information and data needed for the Agency to approve the unapproved inert. If this option is selected and implemented, the Agency may request an extension in the PRIA decision review timeframe to accommodate the inert review/approval process;
4. Withdraw the application (the Agency retains 25% of the full fee for the fee category estimated); or

If none of these options is selected and implemented by the applicant within the 21 day content review period, the Agency will reject the application and retain 25% of the full fee of the category identified.

Conventional New Product Applications

When the Registration Division identifies an unapproved inert on a CSF with an application for a new product that the applicant has not identified as requiring an inert approval (R300 or R301), it will contact the applicant with the following options:

1. Correct the application by, for instance, correcting the inert's identity or CAS number, providing documentation that the inert has been approved, or removing the unapproved inert from the CSF or replacing it with one that is approved for the application's uses; or
2. Submit the information and data needed for the Agency to approve the unapproved inert, including any required petition to establish or amend a tolerance or exemption from a tolerance. (This option may change the PRIA category for the application, which could require a longer decision review time and a larger fee. If additional fees are due, they must be received by the Agency within the 21 day content review period.)

3. Withdraw the application (the Agency retains 25% of the full fee for the fee category estimated); or

If none of the above options is selected and implemented during the 21-day content-review period, the Agency will reject the application and retain 25% of the appropriate fee for the new product-inert approval category.

PIP Applications

When the Biopesticide and Pollution Prevention Division identifies an unapproved inert on a PIP CSF and a request to approve the inert does not accompany the application, it will contact the applicant with the following options:

1. Correct the application by, for instance, correcting the spelling or name of the inert to that in 40 CFR 174, or providing documentation that the inert has been approved; or
2. Submit the information and data needed for the Agency to approve the unapproved inert. If an inert ingredient tolerance exemption petition is required, the petition must be received by the Agency and the B903 fee paid within the 21 day period. If this option is selected and implemented, the Agency will discuss harmonizing the timeframe for both actions.
3. Withdraw the application (the Agency retains 25% of the full fee for the fee category estimated); or

If none of the above options is selected and implemented during the 21 day content review period, the Agency will reject the application and retain 25% of the fee.

B. A policy on documentation of offers to pay is still being developed, however, for a me-too or fast track (similar/identical) new product, R300 or A530, an application without the necessary authorizations of offers to pay will be placed into either R301 or A531. The Agency recommends that authorizations of offers to pay be submitted with other PRIA applications to avoid delays in the Agency's decision.

C. Biopesticide applicants are advised to contact the Agency and discuss study waivers prior to submitting their application to the Agency. Documentation of such discussions should be submitted with the study waiver.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

January 25, 2018

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

OPP Decision Number: D-537618
EPA File Symbol or Registration Number: 87373-2
Product Name: DELTAMETHRIN TECHNICAL
EPA Receipt Date: 19-Jan-2018
EPA Company Number: 87373
Company Name: ARGITE, LLC

MS. ANN TILLMAN
PYXIS REGULATORY CONSULTING, INC.
ARGITE, LLC
4110 136TH STREET CT. NW
GIG HARBOR, WA 98332-9122

SUBJECT: Receipt of Registration Amendment Subject to Registration Service Fee

Dear Registrant:

The Office of Pesticide Programs has received your amendment and certification of payment. If you submitted data with this application, the results of the PRN-2011-3 screen will be communicated separately. During the administrative screen, the Office of Pesticide Programs has determined that this Action is subject to a Pesticide Registration Service Fee as defined in the Pesticide Registration Improvement Act.

The Action has been identified as Action Code: R351

AMENDMENT; UNREGISTERED SOURCE OF ACTIVE INGREDIENT;

No additional payment is due at this time.

If you have any questions, please contact the Pesticide Registration Service Fee Ombudsman at (703) 347-0510.

Sincerely,

A handwritten signature in black ink, appearing to be "Jal" or similar, written over a horizontal line.

Front End Processing Staff
Information Technology & Resources Management Division



Environmental Protection Agency

United States
Washington, DC 20460

- ☐ Registration
- ☒ Amendment
- ☐ Other

OPP Identifier Number

Application for Pesticide – Section I

1. Company/Product Number 87373-2	2. EPA Product Manager R. Gebken	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Argite, LLC/Deltamethrin Technical	PM# 10	
5. Name and Address of Applicant (include ZIP Code) Argite, LLC c/o Pyxis Regulatory Consulting Inc. 4110 136 th St. Ct. NW Gig Harbor, WA 98332	6. Expedited Review. In accordance with FIFRA Section 3(c)(3)(b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

Section - II

<input checked="" type="checkbox"/> Amendment – Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input type="checkbox"/> Notification – Explain below.	<input type="checkbox"/> Other – Explain below.

Explanation: Use additional page(s) if necessary. (For Section I and Section II.)

This application falls under Category R351 (57: Amendment adding a new unregistered source of active ingredient).

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		<input type="checkbox"/> Metal	
* Certification must be submitted				<input type="checkbox"/> Plastic	
				<input type="checkbox"/> Glass	
	If "Yes" Unit Packaging wgt. _____	No. per container _____	If "Yes" Package wgt. _____	No. per container _____	<input type="checkbox"/> Paper
					<input checked="" type="checkbox"/> Other (Specify) LDPE or HDPE liners in HDPE or metal steel drums _____
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container 55.12 lb (25 kg), 110 lb (50 kg), 220.46 lb (100 kg), 330.7 lb (150 kg), 440.9 lb (200 kg), 1,102.3 lb (500 kg), 1,763.7 lb (800 kg)		5. Location of Label Directions <input checked="" type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product	
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Other _____ <input checked="" type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled					

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)					
Name Ann M. Tillman		Title Agent		Telephone No. (Include Area Code) (253) 853-7369	
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.					6. Date Application Received (Stamped)
2. Signature 		3. Title Agent			
4. Typed Name Ann M. Tillman		5. Date Jan. 18, 2018			

January 18, 2018

ELECTRONIC SUBMISSION

Richard Gebken (PM 10)
 Document Processing Desk (**REGFEE**)
 Office of Pesticide Programs (7504P)
 U.S. Environmental Protection Agency
 Room S-4900, One Potomac Yard
 2777 S. Crystal Drive
 Arlington, VA 22202

RE: Argite, LLC
 Deltamethrin Technical (EPA Reg. No. 87373-2)
 Application to Amend Registration
 PRIA Category R351

Dear Mr. Gebken,

On behalf of Argite, LLC, I am submitting an application to amend the registration of Deltamethrin Technical to add an unregistered source of active ingredient. In support of this application, I am submitting the following documents:

1. Application for a Pesticide Registration (EPA Form 8570-1)
2. Confidential Statement of Formula (EPA Form 8570-4) for Alternate Formulation #1 dated Jan. 12, 2018
3. Certification with Respect to Citation of Data (EPA Form 8570-34)
4. Agency Internal Use Copy of the Data Matrix (EPA Form 8570-35)
5. Public File Copy of the Data Matrix (EPA Form 8570-35)
6. Copy of PRIA receipt of payment
7. Letter of Authorization from Argite, LLC
8. Product Specific Data:

MRID	Guideline	Report Title
50395701	830.1550, 830.1600, 830.1620, 830.1670, 830.1750	Tillman, Ann M. Deltamethrin Technical: Product Identity and Composition, Description of the Materials Used, Description of the Production Process, Discussion of the Formation of Impurities, and Certified Limits. <i>Contains Confidential Business Information.</i>

R. Gebken
January 18, 2018
Page 2 of 2

MRID	Guideline	Report Title
50395702	830.1700, 830.1800	Vohra, Y. Preliminary Analyses of Five Representative Production Batches of Deltamethrin Technical Grade Active Ingredient (TGAI) to Determine % Deltamethrin and to Quantify its Associated Impurities. JRF Study No. 9323. February 2010. <i>Contains Confidential Business Information.</i>

Argite, LLC is using the cite-all method of data support. As per EPA's interpretations of 40 CFR Parts 152.86(b)(2)(i) and 152.93(b)(2)(i), Argite LLC submitted notices of intent to apply and offers to pay to all companies on the January 9, 2018 Data Submitter's List for deltamethrin.

This action falls under PRIA category R351 (57: Amendment adding an unregistered source of active ingredient). The fee for this action is \$13,226 and has been paid.

Please contact me ((253) 853-7369, Ann@PyxisRC.com) if you have any questions or need any additional information.

Sincerely,



Ann M. Tillman

Enclosures



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
1200 Pennsylvania Avenue, N.W.
WASHINGTON, D.C. 20460

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 1.25 hours per response for registration and 0.25 hours per response for reregistration and special review activities, including time for reading the instructions and completing the necessary forms. Send comments regarding burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, Collection Strategies Division (2822T), U.S. Environmental Protection Agency, 1200 Pennsylvania Avenue, N.W., Washington, DC 20460. Do not send the complete form to this address.

Certification with Respect to Citation of Data

Applicant's/Registrant's Name, Address, and Telephone Number Argite, LLC c/o Pyxis Regulatory Consulting, Inc. 4110 136 th St. Ct. NW Gig Harbor, WA 98332 (253) 853-7369	EPA Registration Number/File Symbol/ 87373-2
Active Ingredient(s) and/or representative test compound(s) Deltamethrin	Date Jan. 17, 2018
General Use Pattern(s) (list all those claimed for this product using 40 CFR Part 158) TGA1	Product Name Deltamethrin Technical

NOTE: If your product is a 100% repackaging of another purchased EPA-registered product labeled for all the same uses on your label, you do not need to submit this form. You must submit the Formulator's Exemption Statements (EPA Form 8570-27).

☐ I am responding to a Data-Call-In Notice, and have including with this form a list of companies send offer of compensation (the Data Matrix form should be used for this purpose).

SECTION I: METHOD OF DATA SUPPORT (Check one method only)

<input type="checkbox"/> I am using the cite-all method of support, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).	<input checked="" type="checkbox"/> I am using the selective method of support (or cite-all option under the selective method), and have included with this form a completed list of data requirements (the Data Matrix form must be used).
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SECTION II: GENERAL OFFER TO PAY

[Required if using the cite-all method or when using the cite-all option under the selective method to satisfy one or more data requirements]

☒ I hereby offer and agree to pay compensation, to other persons, with regard to the approval of this application, to the extent required by FIFRA.

SECTION III: CERTIFICATION

I certify that this application for registration, this form for reregistration, or this Data-Call-In response is supported by all data submitted or cited in the application for registration, the form for reregistration, or the Data-Call-In response. In addition, if the cite-all option or cite-all option under the selective method is indicated in Section I, this application is supported by all data in the Agency's files that (1) concern the properties or effects of this product or an identical or substantially similar product, or one or more of the ingredients in this product; and (2) is a type of data that would be required to be submitted under the data requirements in effect on the date of approval of this application if the application sought the initial registration of a product of identical or similar composition and uses.

I certify that for each exclusive use study cited in support of this registration or reregistration, that I am the original data submitter or that I have obtained the written permission of the original data submitter to cite that study.

I certify that for each study cited in support of this registration or reregistration that is not an exclusive use study, either: (a) I am the original data submitter; (b) I have obtained the permission of the original data submitter to use the study in support of this application; (c) all periods of eligibility for compensation have expired for the study; (d) the study is in the public literature; or (e) I have notified in writing the company that submitted the study and have offered (I) to pay compensation to the extent required by sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA; and (II) to commence negotiations to determine the amount and terms of compensation, if any, to be paid for the use of the study.

I certify that in all instances where an offer of compensation is required, copies of all offers to pay compensation and evidence of their delivery in accordance with sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA are available and will be submitted to the Agency upon request. Should I fail to produce such evidence to the Agency upon request, I understand that the Agency may initiate action to deny, cancel or suspend the registration of my product in conformity with FIFRA.

I certify that the statements I have made on this form and all attachments to it are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

Signature 	Date Jan. 17, 2018	Typed or Printed Name and Title Ann M. Tillman Agent
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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W.
WASHINGTON, D.C. 20460

Form Approved OMB No. 2070-0060

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 0.25 hours per response for registration activities and 0.25 hours per response for re-registration and special review activities, including time for reviewing the instructions and completing the necessary forms. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (2137), U.S. Environmental Protection Agency, 401 M Street, S.W., Washington, DC 20460. Do not send the form to this address.

DATA MATRIX

Date Jan. 17, 2018	EPA Reg No./File Symbol 87373-2	Page 1 of 8
Applicant's/Registrant's Name & Address Argite, LLC 501 Cascade Pointe Lane, Suite 102 Cary, NC 27513		Product Deltamethrin Technical
Ingredient: Deltamethrin (CAS No. 52918-63-5)		

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
PRODUCT SPECIFIC DATA REQUIREMENTS					
830.1550	Product identity and composition	50395701 47866501	Argite, LLC Tagros Chemicals India, Ltd.	OWN PER	
830.1600	Description of Materials Used to Produce the Product	50395701 47866501	Argite, LLC Tagros Chemicals India, Ltd.	OWN PER	
830.1620	Description of the Production Process	50395701 47866501	Argite, LLC Tagros Chemicals India, Ltd.	OWN PER	
830.1650	Description of the Formulation Process				See endnote 1
830.1670	Discussion of Formation of Impurities	50395701 47866501	Argite, LLC Tagros Chemicals India, Ltd.	OWN PER	
830.1700	Preliminary Analysis	50395702 47866502	Argite, LLC Tagros Chemicals India, Ltd.	OWN PER	
830.1750	Certified Limits	50395701 47866501	Argite, LLC Tagros Chemicals India, Ltd.	OWN PER	
830.1800	Enforcement Analytical Method	50395702 47866502	Argite, LLC Tagros Chemicals India, Ltd.	OWN PER	
830.6302	Color	47866503	Tagros Chemicals India, Ltd.	PER	
830.6303	Physical State	47866503	Tagros Chemicals India, Ltd.	PER	
830.6304	Odor	47866503	Tagros Chemicals India, Ltd.	PER	
830.6313	Stability to Normal and Elevated Temperatures, Metals and Metal Ions	47866503	Tagros Chemicals India, Ltd.	PER	

Signature

Name and Title

Ann M. Tillman, Agent

Date

Jan. 17, 2018



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W.
WASHINGTON, D.C. 20460

Form Approved OMB No. 2070-0060

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DATA MATRIX

Date Jan. 17, 2018	EPA Reg No./File Symbol 87373-2	Page 2 of 8
Applicant's/Registrant's Name & Address Argite, LLC 501 Cascade Pointe Lane, Suite 102 Cary, NC 27513		Product Deltamethrin Technical

Ingredient: Deltamethrin (CAS No. 52918-63-5)

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
830.6314	Oxidation/Reduction: Chemical Incompatibility				See endnote ²
830.6315	Flammability				See endnote ³
830.6316	Explosibility				See endnote ⁴
830.6317	Storage Stability	48623201	Tagros Chemicals India, Ltd.	PER	
830.6319	Miscibility				See endnote ⁵
830.6320	Corrosion Characteristics	48623201	Tagros Chemicals India, Ltd.	PER	
830.6321	Dielectric Breakdown Voltage				See endnote ⁶
830.7000	pH	47866503	Tagros Chemicals India, Ltd.	PER	
830.7050	UV/Visible Absorption	47866503	Tagros Chemicals India, Ltd.	PER	
830.7100	Viscosity				See endnote ⁷
830.7200	Melting Point/Melting Range	47866503	Tagros Chemicals India, Ltd.	PER	
830.7220	Boiling Point/Boiling Range				See 830.7200
830.7300	Density/Relative Density/Bulk Density	47866503	Tagros Chemicals India, Ltd.	PER	
830.7370	Dissociation Constants in Water				See endnote ⁸
830.7520	Particle size, fiber length, and diameter distribution				See endnote ⁹
830.7550	Partition Coefficient (n-octanol/water), Shake Flask Method				See 830.7570
830.7560	Partition Coefficient (n-octanol/water), Generator Method				See 830.7570
830.7570	Partition Coefficient (n-octanol/water), Estimation by Liquid Chromatography	47866503	Tagros Chemicals India, Ltd.	PER	

Signature

Name and Title
Ann M. Tillman, Agent

Date
Jan 17, 2018



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DATA MATRIX

Date Jan. 17, 2018

EPA Reg No./File Symbol 87373-2

Page 3 of 8

Applicant's/Registrant's Name & Address
Argite, LLC
501 Cascade Pointe Lane, Suite 102
Cary, NC 27513

Product
Deltamethrin Technical

Ingredient: Deltamethrin (CAS No. 52918-63-5)

Guideline Reference Number	Guideline Study Name	MIRID Number	Submitter	Status	Note
830.7840	Water Solubility: Column Elution Method, Shake Flask Method	47866503	Tagros Chemicals India, Ltd.	PER	
830.7860	Water Solubility: Generator Column Method	47866503	Tagros Chemicals India, Ltd.	PER	
830.7950	Vapor Pressure	47866503	Tagros Chemicals India, Ltd.	PER	
870.1100	Acute Oral Toxicity: Rat	Cite-All		PAY	
870.1200	Acute Dermal Toxicity: Rat	Cite-All		PAY	
870.1300	Acute Inhalation Toxicity: Rat	Cite-All		PAY	
870.2400	Primary Eye Irritation Rabbit	Cite-All		PAY	
870.2500	Primary Dermal Irritation	Cite-All		PAY	
870.2600	Dermal Sensitization	Cite-All		PAY	

GENERIC DATA REQUIREMENTS

Argite, LLC will make offers-to-pay to the following companies on the Jan. 9, 2018 data submitters list for deltamethrin.

	Cite-All	P.F. Harris Manufacturing Company, LLC	PAY
	Cite-All	Bonide Products, Inc.	PAY
	Cite-All	Senoret Chemical Company, Inc.	PAY
	Cite-All	The Scotts Company	PAY
	Cite-All	Bayer CropScience LP	PAY
	Cite-All	FMC Corporation	PAY

Signature

Name and Title
Ann M. Tillman, Agent

Date
Jan. 17, 2018



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DATA MATRIX

Date Jan. 17, 2018	EPA Reg No./File Symbol 87373-2	Page 4 of 8			
Applicant's/Registrant's Name & Address Argite, LLC 501 Cascade Pointe Lane, Suite 102 Cary, NC 27513	Product Deltamethrin Technical				
Ingredient: Deltamethrin (CAS No. 52918-63-5)					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
		Cite-All	E. I. Du Pont de Nemours and Company	PAY	
		Cite-All	Bayer Environmental Science	PAY	
		Cite-All	Chase Products Co	PAY	
		Cite-All	BASF Corporation	PAY	
		Cite-All	Value Gardens Supply, LLC	PAY	
		Cite-All	Southern Agricultural Insecticides, Inc.	PAY	
		Cite-All	Green Light Company	PAY	
		Cite-All	McLaughlin Gormley King Company	PAY	
		Cite-All	Zep, Inc.	PAY	
		Cite-All	Sergeant's Pet Care Products, Inc.	PAY	
		Cite-All	Reckitt Benckiser LLC	PAY	
		Cite-All	Bacon Products Company, Inc.	PAY	
		Cite-All	S. C. Johnson & Son Inc.	PAY	
		Cite-All	Voluntary Purchasing Groups, Inc.	PAY	
		Cite-All	J. J. Mauget Co.	PAY	
		Cite-All	Safeguard Chemical Corporation	PAY	
		Cite-All	The Andersons, Inc.	PAY	
		Cite-All	Chemisco	PAY	
		Cite-All	Sumitomo Chemical Company, Ltd.	PAY	

Signature

Name and Title
Ann M. Tillman, Agent

Date
Jan. 17, 2018



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DATA MATRIX

Date Jan. 17, 2018

EPA Reg No./File Symbol 87373-2

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Applicant's/Registrant's Name & Address
Argite, LLC
501 Cascade Pointe Lane, Suite 102
Cary, NC 27513

Product

Deltamethrin Technical

Ingredient: Deltamethrin (CAS No. 52918-63-5)

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
		Cite-All	Amrep, Inc.	PAY	
		Cite-All	Bayer Healthcare LLC	PAY	
		Cite-All	Plaze Georgia	PAY	
		Cite-All	Speer Products Inc.	PAY	
		Cite-All	Rainbow Technology Corporation	PAY	
		Cite-All	IZLResearch USA, Inc.	PAY	
		Cite-All	Phaeton Corporation	PAY	
		Cite-All	Hoechst Schering Agrevo S.A.	PAY	
		Cite-All	Aerochem, Inc.	PAY	
		Cite-All	Mystic Chemical Products	PAY	
		Cite-All	Lawson Products, Inc.	PAY	
		Cite-All	Zep Commercial Sales & Service	PAY	
		Cite-All	Safer, Inc.	PAY	
		Cite-All	Questspecialty Corporation	PAY	
		Cite-All	CTX-CENOL, Inc.	PAY	
		Cite-All	K-G Spray-Pak, Inc.	PAY	
		Cite-All	Walla Walla Environmental, Inc.	PAY	
		Cite-All	Control Solutions, Inc.	PAY	
		Cite-All	Valent U.S.A. LLC	PAY	
		Cite-All	Pyrethroid Working Group	PAY	

Signature

Name and Title

Ann M. Tillman, Agent

Date

Jan. 17, 2018



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WASHINGTON, D.C. 20460

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DATA MATRIX

Date Jan. 17, 2018		EPA Reg No./File Symbol 87373-2	Page 6 of 8		
Applicant's/Registrant's Name & Address Argite, LLC 501 Cascade Pointe Lane, Suite 102 Cary, NC 27513		Product Deltamethrin Technical			
Ingredient: Deltamethrin (CAS No. 52918-63-5)					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
		Cite-All	Arysta Lifescience North America, LLC	PAY	
		Cite-All	Spray Drift Task Force	OWN	
		Cite-All	Hedley Technologies (USA) Inc.	PAY	
		Cite-All	Ecto Development Corporation	PAY	
		Cite-All	Bugg Products LLC	PAY	
		Cite-All	Intervet, Inc.	PAY	
		Cite-All	Bengal Products Inc	PAY	
		Cite-All	Excel Marketing	PAY	
		Cite-All	Outdoor Residential Exposure Task Force	OWN	
		Cite-All	Agricultural Reentry Task Force	OWN	
		Cite-All	Manna Pro Products, LLC	PAY	
		Cite-All	Valent Biosciences Corporation	PAY	
		Cite-All	Non-Dietary Exposure Task Force	PAY	
		Cite-All	Swiss Farms Products	PAY	
		Cite-All	Tagros Chemicals India Private, Ltd.	PAY	
		Cite-All	FIFRA Endangered Species Task Force, LLC	PAY	
		Cite-All	Residential Exposure Joint Venture	PAY	

Signature

Name and Title

Ann M. Tillman, Agent

Date

Jan. 17, 2018

Endnotes for Data Matrix for Argite, LLC Deltamethrin Technical (87373-2)

-
- ¹ This guideline is not applicable since the product is a TGA1.
- ² This guideline is not applicable as it does not contain oxidizing or reducing agents.
- ³ This guideline is not applicable as it does not contain combustible liquids.
- ⁴ This guideline is not applicable as the product is not potentially explosive.
- ⁵ This guideline is not applicable as the product is not intended for dilution with petroleum solvents.
- ⁶ This guideline is not applicable as the product is not intended for use around electrical equipment.
- ⁷ This guideline is not required because the product is a solid.
- ⁸ This guideline is not required since there is no acidic or basic functionality in the Deltamethrin molecule. The measurement of pKa is only applicable to molecules which have an acid group (carboxylate, phenol or phosphoric acid for example) or basic group (amine). None of the methrin compounds fall into this class being neutral molecules.
- ⁹ This guideline is not required because the product is not a fibrous material not is it water insoluble.



4110 136TH ST CT NW
GIG HARBOR, WA 98332
T: (253) 853-7369
F: (253) 853-5516
ANN@PYXISRC.COM

MRID 50395700

January 18, 2018

ELECTRONIC SUBMISSION

Richard Gebken (PM 10)
Document Processing Desk (**REGFEE**)
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 S. Crystal Drive
Arlington, VA 22202

RE: Argite, LLC
Deltamethrin Technical (EPA Reg. No. 87373-2)
Application to Amend Registration
PRIA Category R351

Dear Mr. Gebken,

On behalf of Argite, LLC, I am submitting an application to amend the registration of Deltamethrin Technical to add an unregistered source of active ingredient. In support of this application, I am submitting the following documents:

1. Application for a Pesticide Registration (EPA Form 8570-1)
2. Confidential Statement of Formula (EPA Form 8570-4) for Alternate Formulation #1 dated Jan. 12, 2018
3. Certification with Respect to Citation of Data (EPA Form 8570-34)
4. Agency Internal Use Copy of the Data Matrix (EPA Form 8570-35)
5. Public File Copy of the Data Matrix (EPA Form 8570-35)
6. Copy of PRIA receipt of payment
7. Letter of Authorization from Argite, LLC
8. Product Specific Data:

MRID	Guideline	Report Title
50395701	830.1550, 830.1600, 830.1620, 830.1670, 830.1750	Tillman, Ann M. Deltamethrin Technical: Product Identity and Composition, Description of the Materials Used, Description of the Production Process, Discussion of the Formation of Impurities, and Certified Limits. <i>Contains Confidential Business Information.</i>

MRID	Guideline	Report Title
50395702	830.1700, 830.1800	Vohra, Y. Preliminary Analyses of Five Representative Production Batches of Deltamethrin Technical Grade Active Ingredient (TGAI) to Determine % Deltamethrin and to Quantify its Associated Impurities. JRF Study No. 9323. February 2010. <i>Contains Confidential Business Information.</i>

Argite, LLC is using the cite-all method of data support. As per EPA's interpretations of 40 CFR Parts 152.86(b)(2)(i) and 152.93(b)(2)(i), Argite LLC submitted notices of intent to apply and offers to pay to all companies on the January 9, 2018 Data Submitter's List for deltamethrin.

This action falls under PRIA category R351 (57: Amendment adding an unregistered source of active ingredient). The fee for this action is \$13,226 and has been paid.

Please contact me ((253) 853-7369, Ann@PyxisRC.com) if you have any questions or need any additional information.

Sincerely,



Ann M. Tillman

Enclosures



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

May 31, 2017

Arianna Shorey
Argite, LLC
c/o Pyxis Regulatory Consulting Inc.
4110 136th St. Ct. NW
Gig Harbor, WA 98332

Subject: Label Amendment – Add Previously Approved Food and Non-Food Uses
Product Name: DELTAMETHRIN TECHNICAL
EPA Registration Number: 87373-2
Application Date: April 21, 2017
Decision Number: 529047

Dear Ms. Shorey:

The amended label referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, is acceptable. This approval does not affect any conditions that were previously imposed on this registration. You continue to be subject to existing conditions on your registration and any deadlines connected with them.

A stamped copy of your labeling is enclosed for your records. This labeling supersedes all previously accepted labeling. You must submit one copy of the final printed labeling before you release the product for shipment with the new labeling. In accordance with 40 CFR 152.130(c), you may distribute or sell this product under the previously approved labeling for 18 months from the date of this letter. After 18 months, you may only distribute or sell this product if it bears this new revised labeling or subsequently approved labeling. "To distribute or sell" is defined under FIFRA section 2(gg) and its implementing regulation at 40 CFR 152.3.

Should you wish to add/retain a reference to the company's website on your label, then please be aware that the website becomes labeling under the Federal Insecticide Fungicide and Rodenticide Act and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded and unlawful to sell or distribute under FIFRA section 12(a)(1)(E). 40 CFR 156.10(a)(5) list examples of statements EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product's label, claims made on the website may not substantially differ from those claims approved through the registration process. Therefore, should the Agency find or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA approved registration, the website will be referred to the EPA's Office of Enforcement and Compliance.

Your release for shipment of the product constitutes acceptance of these conditions. If these conditions are not complied with, the registration will be subject to cancellation in accordance

Page 2 of 2
EPA Reg. No. 87373-2
Decision No. 529047

with FIFRA section 6. If you have any questions, please contact Maggie Rudick by phone at 703-347-0257, or via email at rudick.maggie@epa.gov.

Sincerely,



Gene Benbow, Acting Product Manager 4
Invertebrate & Vertebrate Branch 1
Registration Division (7505P)
Office of Pesticide Programs

Deltamethrin Technical

An Insecticide for Formulation Use Only

ACTIVE INGREDIENT:

Deltamethrin*

OTHER INGREDIENTS:

TOTAL

98.5%
1.5%
100.0%

*[1R,3R]-3[2,2-dibromovinyl]-2,2-dimethyl-cyclopropane-carboxylic acid (S)-alpha-cyano-3-phenoxybenzyl ester

KEEP OUT OF REACH OF CHILDREN

WARNING

FIRST AID

- | | |
|-------------------------|--|
| If Swallowed: | <ul style="list-style-type: none">• Immediately call a poison control center or doctor for treatment advice.• Do not induce vomiting unless told to do so by a poison control center or doctor• Have person sip a glass of water if able to swallow• Do not give anything by mouth to an unconscious person |
| If Inhaled: | <ul style="list-style-type: none">• Move person to fresh air.• If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth, if possible• Call a poison control center or doctor for further treatment advice. |
| If on Skin or Clothing: | <ul style="list-style-type: none">• Take off contaminated clothing.• Rinse skin immediately with plenty of water for 15 - 20 minutes• Call a poison control center or doctor for treatment advice |
| If in Eyes: | <ul style="list-style-type: none">• Hold eye open and rinse slowly and gently with water for 15 - 20 minutes.• Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.• Call a poison control center or doctor for treatment advice. |

HOTLINE NUMBER

Have the product container or label with you when calling a poison control center or doctor, or going for treatment. For information on this product, contact the National Pesticide Information Center, 1-800-858-7378. You may also contact the National Poison Control Center, 1-800-222-1222 for emergency medical treatment information.

FOR CHEMICAL EMERGENCY: Spill, leak, fire, exposure, or accident call CHEMTREC 1-800-424-9300

Manufactured for:

Argite, LLC

501 Cascade Pointe Lane, Suite 102

Cary, NC 27513

Net Weight: 25 kg (55.1 lbs.) 50 kg (110.23 lbs.)

EPA Reg. No. 87373-2

EPA Est. No. XXXXX-XXX-XXX

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

May be fatal if swallowed. Harmful if inhaled or absorbed through skin. Avoid breathing dust and contact with eyes, skin or clothing. Remove contaminated clothing and wash before reuse. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco, or using the toilet. Skin exposure may result in a sensation described as a tingling, itching, burning or prickly feeling. Onset may occur immediately to 4 hours after exposure and may last 2-30 hours. Wash exposed areas once with soap and water. Relief from skin sensation may be obtained by applying an oil-based cream.

ENVIRONMENTAL HAZARDS

This product is extremely toxic to fish and other aquatic organisms. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the Environmental Protection Agency.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. Intended for the formulation into an insecticide for the following uses ONLY

- 1) Bulb Vegetables, Group 3-07 Vegetable, cucurbit, Group 9, Vegetable, fruiting, Group 8-10 Vegetable root, except sugar beet, Subgroup 1B: Vegetable, tuberous and corm Subgroup 1C, Fruit, pome, Group 11-10, Nut, tree, Group 14: Rapeseed, Cotton; Corn (field, pop, sweet), Soybean, Sorghum, Sunflower, Domestic Indoor (household), Domestic Outdoor (lawns, perimeters, ornamentals), Commercial/Industrial/Institutional (indoor and outdoor), Food Handling Establishments (edible product areas), Terrestrial Non-Food (sod farms, golf courses, non-agricultural sites), various modes of transportation;
 - 3) Stored grains for food, feed and oils;
 - 4) Stored seeds [with stored grain tolerances -wheat, barley, oats, rice and sorghum (milo)];
 - 5) For use in the manufacture of polystyrene foam insulation to protect it from termites and other wood destroying insects. For best results, Deltamethrin Technical should be incorporated into the polystyrene from insulation at a rate of up to 1500 ppm active ingredient. The finished board must have the following label:
Polystyrene foam [or Company trade name for foam] insulation contains Deltamethrin to [which will] protect the foam from termites and other wood destroying insects.
 - 6) Pet collars and topical application to companion animals;
 - 7) Uses for which U.S. EPA has accepted the required data and/or citations of data that the formulator has submitted in support of registration.
 - 8) Uses for experimental purposes that are in compliance with U.S. EPA requirements
- Each formulator is responsible for obtaining EPA registration for their end-use product(s). This product may be used to formulate products for any additional uses not listed on the technical label if the formulator, user group, or grower has complied with U.S. EPA data submission requirements regarding the support of such uses.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

PESTICIDE STORAGE: Store in original container, in a cool dry locked area. Store separately from other pesticides, fertilizers, food or feed to prevent contamination

PESTICIDE DISPOSAL: Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

CONTAINER HANDLING: Nonrefillable containers. DO NOT reuse or refill this container.

LDPE/Metal Drum with Liner: Completely empty liner by shaking and tapping sides and bottom to loosen clinging particles. Empty residue into formulation equipment. Then offer for recycling, if available, or dispose of liner in a sanitary landfill, or by incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke. Offer drum for recycling or reconditioning, if appropriate, or puncture and dispose of in a sanitary landfill, or by other procedures approved by state and local authorities.

CONDITION OF SALE AND LIMITATION OF WARRANTY

Argite, LLC warrants that this product conforms to the chemical description on the label thereof and is reasonably fit for the purposes stated on such label only when used in accordance with the directions under normal use conditions. Crop injury, ineffectiveness or other unintended consequences may result because of such factors as weather conditions, presence of other materials, or the manner of use or application, all of which are beyond the control of Argite, LLC. To the extent consistent with applicable law, Argite, LLC shall not be liable for consequential, special or indirect damages resulting from the use or handling of this product. To the extent consistent with applicable law, the exclusive remedy of any Buyer or User of this product and any and all losses, injuries, or damages resulting from or in any way arising from the use, handling, or application of this product, whether in contract, warranty, tort negligence, strict liability, or otherwise, shall not exceed the purchase price of this product. To the extent consistent with applicable law, all such risks shall be assumed by the Buyer. ARGITE, LLC MAKES NO WARRANTIES OR MERCHANTABILITY OR FITNESS FOR ANY PARTICULAR PURPOSE NOR ANY OTHER EXPRESSED OR IMPLIED WARRANTY EXCEPT AS STATED ABOVE [EPA approval date]





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
1200 Pennsylvania Avenue, N.W.
WASHINGTON, D.C. 20460

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Certification with Respect to Citation of Data

Applicant's/Registrant's Name, Address, and Telephone Number Argite, LLC c/o Pyxis Regulatory Consulting, Inc.; 4110 136 th St. Ct. NW Gig Harbor, WA 98332 (253) 853-7369	EPA Registration Number/File Symbol 87373-2
---	--

Active Ingredient(s) and/or representative test compound(s) Deltamethrin	Date Apr. 21, 2017
---	-----------------------

General Use Pattern(s) (list all those claimed for this product using 40 CFR Part 158) TGAI	Product Name Deltamethrin Technical
--	--

NOTE: If your product is a 100% repackaging of another purchased EPA-registered product labeled for all the same uses on your label, you do not need to submit this form. You must submit the Formulator's Exemption Statements (EPA Form 8570-27).

☐ I am responding to a Data-Call-In Notice, and have including with this form a list of companies send offer of compensation (the Data Matrix form should be used for this purpose).

SECTION I: METHOD OF DATA SUPPORT (Check one method only)

<input type="checkbox"/> I am using the cite-all method of support, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).	<input checked="" type="checkbox"/> I am using the selective method of support (or cite-all option under the selective method), and have included with this form a completed list of data requirements (the Data Matrix form must be used).
--	---

SECTION II: GENERAL OFFER TO PAY

[Required if using the cite-all method or when using the cite-all option under the selective method to satisfy one or more data requirements]

☒ I hereby offer and agree to pay compensation, to other persons, with regard to the approval of this application, to the extent required by FIFRA.

SECTION III: CERTIFICATION

I certify that this application for registration, this form for reregistration, or this Data-Call-In response is supported by all data submitted or cited in the application for registration, the form for reregistration, or the Data-Call-In response. In addition, if the cite-all option or cite-all option under the selective method is indicated in Section I, this application is supported by all data in the Agency's files that (1) concern the properties or effects of this product or an identical or substantially similar product, or one or more of the ingredients in this product; and (2) is a type of data that would be required to be submitted under the data requirements in effect on the date of approval of this application if the application sought the initial registration of a product of identical or similar composition and uses.

I certify that for each exclusive use study cited in support of this registration or reregistration, that I am the original data submitter or that I have obtained the written permission of the original data submitter to cite that study.

I certify that for each study cited in support of this registration or reregistration that is not an exclusive use study, either: (a) I am the original data submitter; (b) I have obtained the permission of the original data submitter to use the study in support of this application; (c) all periods of eligibility for compensation have expired for the study; (d) the study is in the public literature; or (e) I have notified in writing the company that submitted the study and have offered (i) to pay compensation to the extent required by sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA; and (ii) to commence negotiations to determine the amount and terms of compensation, if any, to be paid for the use of the study.

I certify that in all instances where an offer of compensation is required, copies of all offers to pay compensation and evidence of their delivery in accordance with sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA are available and will be submitted to the Agency upon request. Should I fail to produce such evidence to the Agency upon request, I understand that the Agency may initiate action to deny, cancel or suspend the registration of my product in conformity with FIFRA.

I certify that the statements I have made on this form and all attachments to it are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

Signature 	Date Apr. 21, 2017	Typed or Printed Name and Title Arianna Shorey Regulatory Consultant
---------------	-----------------------	---



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

401 M Street, S.W.

WASHINGTON, D.C. 20460

Form Approved OMB No. 2070-0060

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DATA MATRIX

Date April 21, 2017		EPA Reg No./File Symbol 87373-2		Page 1 of 7	
Applicant's/Registrant's Name & Address Argile, LLC 501 Cascade Pointe Lane, Suite 102 Cary, NC 27513		Product Deltamethrin Technical			
Ingredient: Deltamethrin (CAS No. 52918-63-5)					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
PRODUCT SPECIFIC DATA REQUIREMENTS					
830.1550	Product identity and composition	47866501	Tagros Chemicals India, Ltd.	PER	
830.1600	Description of Materials Used to Produce the Product	47866501	Tagros Chemicals India, Ltd.	PER	
830.1620	Description of the Production Process	47866501	Tagros Chemicals India, Ltd.	PER	
830.1650	Description of the Formulation Process				
830.1670	Discussion of Formation of Impurities	47866501	Tagros Chemicals India, Ltd.	PER	See endnote ¹
830.1700	Preliminary Analysis	47866502	Tagros Chemicals India, Ltd.	PER	
830.1750	Certified Limits	47866501	Tagros Chemicals India, Ltd.	PER	
830.1800	Enforcement Analytical Method	47866502	Tagros Chemicals India, Ltd.	PER	
830.6302	Color	47866503	Tagros Chemicals India, Ltd.	PER	
830.6303	Physical State	47866503	Tagros Chemicals India, Ltd.	PER	
830.6304	Odor	47866503	Tagros Chemicals India, Ltd.	PER	
830.6313	Stability to Normal and Elevated Temperatures, Metals and Metal Ions	47866503	Tagros Chemicals India, Ltd.	PER	
830.6314	Oxidation/Reduction: Chemical Incompatibility				See endnote ²
830.6315	Flammability				See endnote ³
830.6316	Explosibility				See endnote ⁴
830.6317	Storage Stability	48623201	Tagros Chemicals India, Ltd.	PER	
830.6319	Miscibility				See endnote ⁵
830.6320	Corrosion Characteristics	48623201	Tagros Chemicals India, Ltd.	PER	
830.6321	Dielectric Breakdown Voltage				See endnote ⁶
830.7000	pH	47866503	Tagros Chemicals India, Ltd.	PER	

Signature

Arianna Shorey

Name and Title

Arianna Shorey Regulatory Consultant

Date

April 21, 2017



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DATA MATRIX

Date April 21, 2017		EPA Reg No./File Symbol 87373-2		Page 2 of 7	
Applicant's/Registrant's Name & Address Argite, LLC 501 Cascade Pointe Lane, Suite 102 Cary, NC 27513		Product Deltamethrin Technical			
Ingredient: Deltamethrin (CAS No. 52918-63-5)					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
830.7050	UV/Visible Absorption	47866503	Tagros Chemicals India, Ltd.	PER	
830.7100	Viscosity				See endnote ⁷
830.7200	Melting Point/Melting Range	47866503	Tagros Chemicals India, Ltd.	PER	
830.7220	Boiling Point/Boiling Range				See 830.7200
830.7300	Density/Relative Density/Bulk Density	47866503	Tagros Chemicals India, Ltd.	PER	
830.7370	Dissociation Constants in Water				See endnote ⁸
830.7520	Particle size, fiber length, and diameter distribution				See endnote ⁹
830.7550	Partition Coefficient (n-octanol/water), Shake Flask Method				See 830.7570
830.7560	Partition Coefficient (n-octanol/water), Generator Method				See 830.7570
830.7570	Partition Coefficient (n-octanol/water), Estimation by Liquid Chromatography	47866503	Tagros Chemicals India, Ltd.	PER	
830.7840	Water Solubility: Column Elution Method, Shake Flask Method	47866503	Tagros Chemicals India, Ltd.	PER	
830.7860	Water Solubility: Generator Column Method	47866503	Tagros Chemicals India, Ltd.	PER	
830.7950	Vapor Pressure	47866503	Tagros Chemicals India, Ltd.	PER	
870.1100	Acute Oral Toxicity: Rat	Cite-All		PAY	
870.1200	Acute Dermal Toxicity: Rat	Cite-All		PAY	
870.1300	Acute Inhalation Toxicity: Rat	Cite-All		PAY	
870.2400	Primary Eye Irritation Rabbit	Cite-All		PAY	
870.2500	Primary Dermal Irritation	Cite-All		PAY	

Signature

Arianna Shorey

Name and Title

Arianna Shorey Regulatory Consultant

Date

April 21, 2017



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DATA MATRIX

Date April 21, 2017	EPA Reg No./File Symbol 87373-2	Page 3 of 7
Applicant's/Registrant's Name & Address Argite, LLC 501 Cascade Pointe Lane, Suite 102 Cary, NC 27513	Product Deltamethrin Technical	
Ingredient: Deltamethrin (CAS No. 52918-63-5)		
Guideline Reference Number 870.2600	Guideline Study Name Dermal Sensitization	MRID Number Cite-All
Status PAY		
Note		
GENERIC DATA REQUIREMENTS		
Argite, LLC will make offers-to-pay to the following companies on the April 6, 2017 data submitters list of deltamethrin.		
	Cite-All	P.F. Harris Manufacturing Company, LLC
	Cite-All	Bonide Products, Inc.
	Cite-All	Senoret Chemical Company, Inc.
	Cite-All	The Scotts Company
	Cite-All	Bayer CropScience LP
	Cite-All	FMC Corporation
	Cite-All	E.I. Du Pont de Nemours and Company
	Cite-All	Bayer Environmental Science
	Cite-All	Chase Products Co
	Cite-All	BASF Corporation
	Cite-All	Value Gardens Supply, LLC
	Cite-All	Southern Agricultural Insecticides, Inc.
	Cite-All	Green Light Company
	Cite-All	McLaughlin Gormley King Company
	Cite-All	Zep, Inc.
	Cite-All	Sergeant's Pet Care Products, Inc.
Status PAY		
Note		

Signature

Arianna Shorey

Name and Title

Arianna Shorey Regulatory Consultant

Date

April 21, 2017



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

401 M Street, S.W.
WASHINGTON, D.C. 20460

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DATA MATRIX

Date April 21, 2017		EPA Reg No./File Symbol 87373-2		Page 4 of 7	
Applicant's/Registrant's Name & Address Argite, LLC 501 Cascade Pointe Lane, Suite 102 Cary, NC 27513		Product Deltamethrin Technical			
Ingredient: Deltamethrin (CAS No. 52918-63-5)					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
		Cite-All	Reckitt Benckiser LLC	PAY	
		Cite-All	Bacon Products Company, Inc.	PAY	
		Cite-All	S.C. Johnson & Son Inc.	PAY	
		Cite-All	Voluntary Purchasing Groups, Inc.	PAY	
		Cite-All	J.J. Mauguet Co.	PAY	
		Cite-All	Safeguard Chemical Corporation	PAY	
		Cite-All	The Andersons, Inc.	PAY	
		Cite-All	Chemsico	PAY	
		Cite-All	Sumitomo Chemical Company, Ltd.	PAY	
		Cite-All	Amrep, Inc.	PAY	
		Cite-All	Bayer Healthcare LLC	PAY	
		Cite-All	Apollo Industries Inc.	PAY	
		Cite-All	Speer Products Inc.	PAY	
		Cite-All	Rainbow Technology Corporation	PAY	
		Cite-All	I2LResearch USA, Inc.	PAY	
		Cite-All	Phaeton Corporation	PAY	
		Cite-All	Hoechst Schering Agrovet S.A.	PAY	
		Cite-All	Aerocem, Inc.	PAY	
		Cite-All	Mystic Chemical Products	PAY	
		Cite-All	Lawson Products, Inc.	PAY	
		Cite-All	Zep Commercial Sales & Service	PAY	
		Cite-All	Safer, Inc.	PAY	

Signature

Arianna Shorey

Name and Title

Arianna Shorey Regulatory Consultant

Date

April 21, 2017



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

401 M Street, S.W.

WASHINGTON, D.C. 20460

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DATA MATRIX

Date April 21, 2017		EPA Reg No./File Symbol 87373-2		Page 5 of 7	
Applicant's/Registrant's Name & Address Argite, LLC 501 Cascade Pointe Lane, Suite 102 Cary, NC 27513		Product Deltamethrin Technical			
Ingredient Deltamethrin (CAS No. 52918-63-5)					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
		Cite-All	Questspecialty Corporation	PAY	
		Cite-All	CTX-CENOL, Inc.	PAY	
		Cite-All	K-G Spray-Pak, Inc.	PAY	
		Cite-All	Walla Walla Environmental, Inc.	PAY	
		Cite-All	Control Solutions, Inc.	PAY	
		Cite-All	Valent U.S.A. Corporation	PAY	
		Cite-All	Pyrethroid Working Group	PAY	
		Cite-All	Arysta Lifescience North America, LLC	PAY	
		Cite-All	Spray Drift Task Force	OWN	
		Cite-All	Hedley Technologies (USA) Inc.	PAY	
		Cite-All	Ecto Development Corporation	PAY	
		Cite-All	Bugg Products LLC	PAY	
		Cite-All	Intervet, Inc.	PAY	
		Cite-All	Bengal Products Inc	PAY	
		Cite-All	Excel Marketing	PAY	
		Cite-All	Outdoor Residential Exposure Task Force	OWN	
		Cite-All	Agricultural Reentry Task Force	OWN	
		Cite-All	Star Horse Products Inc.	PAY	
		Cite-All	Valent Biosciences Corporation	PAY	
		Cite-All	Non-Dietary Exposure Task Force	PAY	

Signature

Arianna Shorey

Name and Title

Arianna Shorey Regulatory Consultant

Date

April 21, 2017

EPA Form 8570-35 (9-97) Electronic and Paper versions available. Submit only Paper version.

Agency Internal Use Copy

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WASHINGTON, D.C. 20460

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DATA MATRIX

[illegible]

Signature _____

kraina suonių

Name and Title

Arianna Shorey Regulatory Consultant

Date _____

April 21, 2017

EPA Form 8570-35 (9-97) Electronic and Paper versions available. Submit only Paper version.

Agency Internal Use Copy

Endnotes for Data Matrix for Argite, LLC Deltamethrin Technical (87373-2)

- ¹ This guideline is not applicable since the product is a TGA.
- ² This guideline is not applicable as it does not contain oxidizing or reducing agents.
- ³ This guideline is not applicable as it does not contain combustible liquids.
- ⁴ This guideline is not applicable as the product is not potentially explosive.
- ⁵ This guideline is not applicable as the product is not intended for dilution with petroleum solvents.
- ⁶ This guideline is not applicable as the product is not intended for use around electrical equipment.
- ⁷ This guideline is not required because the product is a solid.
- ⁸ This guideline is not required since there is no acidic or basic functionality in the Deltamethrin molecule. The measurement of pKa is only applicable to molecules which have an acid group (carboxylate, phenol or phosphoric acid for example) or basic group (amine). None of the methrin compounds fall into this class being neutral molecules.
- ⁹ This guideline is not required because the product is not a fibrous material nor is it water insoluble.

FAST-TRACK AMENDMENTS - Completeness Screening Checklist

Expert's In-Processing Signature: Paul Seem Date: 5/1/17 PM #: 3

EPA Reg. Number: <u>87373-2</u>		EPA Receipt Date: <u>4/21/17</u>		
	Checklist Item	Yes	No	N/A
1	Application Form (EPA Form 8570-1) - signed?	<input checked="" type="checkbox"/>		
2	Confidential Statement of Formula (EPA Form 8570-29) - signed?		<input checked="" type="checkbox"/>	
3	Certification with Respect to Citation of Data (EPA Form 8570-34) - signed?		<input checked="" type="checkbox"/>	
4	Formulator's Exemption Statement (EPA Form 8570-27) - signed?		<input checked="" type="checkbox"/>	
5	Data Matrix (EPA Form 8570-35) [Applicable for adding me-too uses] - signed?		<input checked="" type="checkbox"/>	
	a) Selective Method?			
	b) Cite-All Method?			
	c) Public copy of Matrix provided? See PR Notice 98-5			
6	Is Label included? (5 copies)		<input checked="" type="checkbox"/>	
	a) Electronic Label submitted?	<input checked="" type="checkbox"/>		
<p>Comments: <u>Label amendment.</u> → <u>tolerances</u> <u>pull a few labels to</u> <u>ensure DFE</u></p> <p><u>5/9 - asked registrant for cited labels - the 3 they</u> <u>listed were a different chemical</u></p>				

S: 1002643

Milestone Email: Nicole@PyxisRC.com

Regulatory Type: Product Registration - Section 3

Resubmission: ☐ Yes ☒ No

Print Letter

Application Type: Amendment

Fee For Service: ☐ Yes ☒ No

Enter More Information

Billable: ☐ Yes ☒ No

Tracking

Company: 87373 ARGITE, LLC

V

Risk Manager: Registration Division, Risk Management Team 3

Product #: 87373-2 Product Name: DELTAMETHRIN TECHNICAL

Overrides:

Me Too
Section3: 73801-1Me Too Product
Name: DELTAMETHRIN TECHNICAL

...

Application Date: 21-Apr-2017



OPP Rec'd Date: 21-Apr-2017



Front End Date: 25-Apr-2017



Risk Manager Send Date: 26-Apr-2017



FFS Due Date:

Negotiated Due Date:

OPP Target Date:

Fast Track: ☐New Ingredient: ☐

Receipt Description:

Portal submission pkg# 19166 Fast track. Add approved food and non-food uses

New Ingredient

Request Date:

New Ingredient

Received Date:

Form A: ☐

Signature Date:

Form B: ☐

Signature Date:

Receipt Content	Des
Electronic Label	
111	

View/Edit



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

April 26, 2017

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

MS. NICOLE COCHRAN
PYXIS REGULATORY CONSULTING, INC.
ARGITE, LLC
4110 136TH STREET CT NW
GIG HARBOR, WA 98332-9122

PRODUCT NAME: DELTAMETHRIN TECHNICAL
COMPANY NAME: ARGITE, LLC
OPP IDENTIFICATION NUMBER:
EPA FILE SYMBOL: 87373-2
EPA RECEIPT DATE: 04/21/17

SUBJECT: RECEIPT OF AMENDMENT

DEAR REGISTRANT:

The Office of Pesticide Programs has received your application for an amendment and it has passed an administrative screen for completeness.

During the initial screen we determined that the application appears to qualify for fast track review. The package will now be forwarded to the Product Manager for review to determine its acceptability for fast track status.

If you have any questions, please contact Registration Division, Risk Management Team 3, at (703) 306-0415.

Sincerely,

A handwritten signature in black ink, appearing to be "Sincerely, [Signature]", is written over the word "Sincerely,".

Front End Processing Staff
Information Services Branch
Information Technology & Resources Management Division



Environmental Protection Agency

United States
Washington, DC 20460

- ☐ Registration
☒ Amendment
☐ Other

OPP Identifier Number

Application for Pesticide – Section I

1. Company/Product Number 87373-2	2. EPA Product Manager K. Davis	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Argite, LLC / Deltamethrin Technical	PM# PM 3	
5. Name and Address of Applicant (include ZIP Code) Argite, LLC c/o Pyxis Regulatory Consulting Inc. 4110 136 th St. Ct. NW Gig Harbor, WA 98332	6. Expedited Review. In accordance with FIFRA Section 3(c)(3)(b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. 432-762 / 73801-1 Product Name Delta-Tech / Deltamethrin Technical	

Section - II

- ☒ Amendment – Explain below. ☐ Final printed labels in response to Agency letter dated _____
- ☐ Resubmission in response to Agency letter dated _____ ☐ "Me Too" Application.
- ☐ Notification – Explain below. ☐ Other – Explain below.

Explanation: Use additional page(s) if necessary. (For Section I and Section II.)

Non-PRIA Fast Track label amendment to add approved food and non-food uses to the label. Since no data are being submitted with this amendment and no data need to be reviewed to support this amendment, this action does not qualify as a PRIA action and no PRIA fee is required.

D# 529047

Section - III

1. Material This Product Will Be Packaged In:

Child-Resistant Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	2. Type of Container <input type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____	
* Certification must be submitted		If "Yes" Unit Packaging wgt. _____	No. per container _____	If "Yes" Package wgt. _____
		No. per container _____		

3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container	4. Size(s) Retail Container _____	5. Location of Label Directions <input type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled <input type="checkbox"/> Other _____		

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)

Name Arianna Shorey	Title Regulatory Consultant	Telephone No. (Include Area Code) (253) 853-7369
------------------------	--------------------------------	---

Certification

I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

6. Date Application Received
(Stamped)

2. Signature 	3. Title Regulatory Consultant
4. Typed Name Arianna Shorey	5. Date Apr. 21, 2017



4110 136TH ST CT NW
GIG HARBOR, WA 98332
T: (253) 853-7369
F: (253) 853-5516
ARIANNA@PYXISRC.COM

ELECTRONIC SUBMISSION

April 21, 2017

Kable Davis (PM 3)
Document Processing Desk (**AMEND**)
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 S. Crystal Drive
Arlington, VA 22202

RE: Argite, LLC – Deltamethrin Technical (EPA Reg. No. 87373-2)
Non-PRIA Fast Track Label Amendment Adding Approved Uses

Dear Mr. Davis,

On behalf of Argite, LLC, I am submitting an application to amend the registration of Deltamethrin Technical (EPA Reg. No. 87373-2) to add approved food and non-food uses to the label. I was unable to find these uses on other currently registered technical products, however, these uses are found on several registered end use product labels (EPA Reg. Nos. 42750-295, 55146-127, and 89168-65). In addition, these uses were previously approved on the technical label for EPA Reg. No. 73801-1¹ on May 13, 2011. A courtesy copy of this label has been included with this submission. Argite, LLC wants to ensure that its technical label is as comprehensive as possible, despite the apparent oversight for not listing these uses on the labels of other registered technical products.

In addition, Argite, LLC is taking the opportunity to revise the formatting of the label so that it is reflective of the final printed label. This formatting change revises the label to fit on a single page.

In support of this amendment application, I submit the following documents:

1. Application for Amended Pesticide Registration (EPA Form 8570-1)
2. One (1) copy of the revised label for Deltamethrin Technical with changes tracked
3. One (1) copy of the revised label for Deltamethrin Technical with changes incorporated
4. Courtesy copy of the Agency approved label for EPA Reg. No. 73801-1 dated May 13, 2011
5. Certification with Respect to Citation of Data (EPA Form 8570-34)
6. Agency Internal Use Copy of the Data Matrix (EPA Form 8570-35)
7. Public File Copy of the Data Matrix (EPA Form 8570-35)
8. Letter of Authorization

Argite, LLC is using the cite-all method of support. As per EPA's interpretations of 40 CFR Parts 152.86(b)(2)(i) and 152.93(b)(2)(i), Argite, LLC submitted notices of intent to apply and offers to pay to companies on the April 6, 2017 Data Submitter's List for deltamethrin. Since no data are being submitted with this amendment and no data need to be reviewed to support this amendment, this action does not qualify as a PRIA action and no PRIA fee is required.

Please contact me ((253) 853-7369, Arianna@PyxisRC.com) if you have any questions or need any additional information.

Sincerely,

A handwritten signature in black ink that reads "Arianna Shorey".

Arianna Shorey

Enclosures

cc: R. Canady; Argite, LLC

¹ The registration for EPA Reg. No. 73801-1 was canceled on June 3, 2015.

Deltamethrin Technical
An Insecticide for Formulation Use Only

ACTIVE INGREDIENT:

Deltamethrin*

98.5%

90.5%
1.50%

1.5%
00.0%

(1R,3R)-3(2,2-dibromovinyl)-2-dimethyl-cyclopropane-carboxylic acid (S)-alpha-cyano-3-phenoxybenzyl ester

KEEP OUT OF REACH OF CHILDREN

WARNING

FIRST AID

- Immediately call a poison control center or doctor for treatment advice.
- Do not induce vomiting unless told to do so by a poison control center or doctor.
- Have person sip a glass of water if able to swallow.
- Do not give anything by mouth to an unconscious person.

- Move person to fresh air

- If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth, if it is possible.

- Call a poison control center or doctor for further treatment advice.

- Take off contaminated clothing.
- Rinse skin immediately with plenty of water for 15-20 minutes.
- Call a poison control center or doctor for treatment advice.

If in Eyes:

- Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.
- Call a poison control center or doctor for treatment advice.

HOTLINE NUMBER

Have the product container or label with you when calling a poison control center or doctor, or going for treatment. For information on this product, contact the National Pesticide Information Center, 1-800-858-7378. You may also contact the National Poison Control Center, 1-800-222-1222 for emergency medical treatment information.

FOR CHEMICAL EMERGENCY: Spill, leak, fire, exposure, or accident call CHEMTREC 1-800-424-9300

Manufactured for:

Weight: 40 kg (88.1 lbs.) 30 kg (66.1 lbs.)

12.103.1 — 30 kg (110

22 Guymer Court #501 Cascade Palatka Lane Suite 102

erisville, NC 27569 Cary, NC 27513

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

may be fatal if swallowed. Harmful if inhaled or absorbed through skin. Avoid breathing dust and contact with eyes, skin or clothing. Remove contaminated clothing and wash before reuse. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco, or using the toilet. Skin exposure may result in a sensation described as a tingling, itching, burning or prickly feeling. Onset may occur immediately to 4 hours after exposure and may last 2-30 hours. Wash exposed areas once with soap and water. Relief from skin sensation may be obtained by applying an oil-based cream.

ENVIRONMENTAL HAZARDS

This product is extremely toxic to fish and other aquatic organisms. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the Environmental Protection Agency.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. Intended for the formulation into an insecticide for the following uses ONLY.

1. Bulb Vegetables, Cucurbit Vegetables, Fruiting Vegetables, Root Vegetables (except Sugar Beets), Tuberous and Corm Vegetables, Pome Fruits, Tree Nut, Banana and Rain-forest Cotton, Peanut Corn, Sweet Corn, Soybeans, Scutarium and Bumfingers.
2. Domestic Indoor (household), Domestic Outdoor (lawns, penmeiers, ornamentals), Commercial/Industrial (institutional, indoor and outdoor), Food Handling Establishments (edible product areas), Terrestrial Non-Food (sod farms, golf courses, non-agricultural sites), various modes of transportation.

- 3) ~~Stored grains for food feed and oils.~~
4) ~~Stored seeds (with stored grain tolerances – wheat, barley, oats, rice and sorghum (milo)).~~
5) ~~For use in the manufacture of polystyrene foam insulation to protect it from termites and other wood destroying insects. For best results, Deltamethrin Technical should be incorporated into the polystyrene from insulation at a rate of up to 1500 ppm active ingredient.~~
The finished board must have the following label:

Polystyrene foam for Company trade name for foam insulation contains Deltamethrin to which will protect the foam from termites and other wood destroying insects.

- Pet collars and topical application to companion animals;
 Uses for which U.S. EPA has accepted the required data and/or citations of data that the
 formulator has submitted in support of registration.
 Uses for experimental purposes that are in compliance with U.S. EPA requirements

Each formulator is responsible for obtaining EPA registration for their end-use product(s). This product may be used to formulate products for any additional uses not listed on the technical label if the formulator, user group, or grower has complied with U.S. EPA data submission requirements regarding the support of such uses.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

PESTICIDE STORAGE: Store in original container, in a cool dry locked area. Store separately from other pesticides, fertilizers, food or feed to prevent contamination.

PESTICIDE DISPOSAL: Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

CONTAINER HANDLING: Nonrefillable containers. DO NOT reuse or refill this container.

DPE/Metal Drum with Liner: Completely empty liner by shaking and tapping sides and bottom to loosen clinging particles. Empty residue into formulation equipment. Then offer for recycling, if available, or dispose of liner in a sanitary landfill, or by incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke. Offer drum for recycling or reconditioning, if appropriate, or puncture and dispose of in a sanitary landfill, or by other procedures approved by state and local authorities.

CONDITION OF SALE AND LIMITATION OF WARRANTY

Argite, LLC warrants that this product conforms to the chemical description on the label thereof and is reasonably fit for the purposes stated on such label only when used in accordance with the directions under normal use conditions. Crop injury, ineffectiveness or other unintended consequences may result because of such factors as weather conditions, presence of other materials, or the manner of use or application, all of which are beyond the control of Argite, LLC. To the extent consistent with applicable law, Argite, LLC shall not be liable for consequential, special or indirect damages resulting from the use or handling of this product. To the extent consistent with applicable law, the exclusive remedy of any Buyer or User of this product and any and all losses, injuries, or damages resulting from or in any way arising from the use, handling, or application of this product, whether in contract, warranty, tort negligence, strict liability, or otherwise, shall not exceed the purchase price of this product. To the extent consistent with applicable law, all such risks shall be assumed by the Buyer. ARGITE, LLC MAKES NO WARRANTIES OR MERCHANTABILITY OR FITNESS FOR ANY PARTICULAR PURPOSE NOR ANY OTHER EXPRESSED OR IMPLIED WARRANTY EXCEPT AS STATED ABOVE.

EPA approval date]

Deltamethrin Technical

An Insecticide for Formulation Use Only

ACTIVE INGREDIENT:

Deltamethrin*

OTHER INGREDIENTS:

TOTAL 98.5%
1.5%
100.0%

* (1R,3R)-3-(2-dibromovinyl)-2,2-dimethyl-cyclopropane-carboxylic acid (S)-alpha-cyano-3-phenoxybenzyl ester

KEEP OUT OF REACH OF CHILDREN

WARNING

FIRST AID	
If Swallowed:	<ul style="list-style-type: none">• Immediately call a poison control center or doctor for treatment advice.• Do not induce vomiting unless told to do so by a poison control center or doctor.• Have person sip a glass of water if able to swallow.• Do not give anything by mouth to an unconscious person.• Move person to fresh air.• If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth, if possible.• Call a poison control center or doctor for further treatment advice.
If Inhaled:	<ul style="list-style-type: none">• Take off contaminated clothing.• Rinse skin immediately with plenty of water for 15-20 minutes.• Call a poison control center or doctor for treatment advice.
If on Skin or Clothing:	<ul style="list-style-type: none">• Hold eye open and rinse slowly and gently with water for 15-20 minutes.• Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.• Call a poison control center or doctor for treatment advice.

HOTLINE NUMBER

Have the product container or label with you when calling a poison control center or doctor, or going for treatment. For information on this product, contact the National Pesticide Information Center, 1-800-858-7378. You may also contact the National Poison Control Center, 1-800-222-1222 for emergency medical treatment information.

FOR CHEMICAL EMERGENCY: Spill, leak, fire, exposure, or accident call CHEMTREC 1-800-424-9300

Manufactured for: Argite, LLC Net Weight: 25 kg (55.12 lbs.) 50 kg (110.23 lbs.)

102 Guyton Court 501 Cascade Pointe Lane, Suite 102
Morrisville, NC 27569 Cary, NC 27513

EPA Reg. No. 87373-2

EPA Est. No. XXXXX-XXX-XXX

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- 2) Domestic Indoor (household), Domestic Outdoor (lawns, perennials, ornamentals), Commercial/Industrial/Institutional (indoor and outdoor), Food Handling Establishments (edible product areas), Terrestrial Non-Food (soil, farms, golf courses, non-agricultural sites), various modes of transportation
- 3) Stored grains for food, feed and oils.
- 4) Stored seeds (with stored grain tolerances -wheat, barley, oats, rice and sorghum milo).
- 5) For use in the manufacture of polystyrene foam insulation to protect it from termites and other wood destroying insects. For best results, Deltamethrin Technical should be incorporated into the polystyrene foam insulation at a rate of up to 1500 ppm active ingredient.

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(EPA approval date)